

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TULSI GABBARD and TULSI NOW, INC.,

Plaintiffs,

v.

HILLARY RODHAM CLINTON,

Defendant.

Civil Action No. 20-cv-558

**DECLARATION OF GLORIA K. MAIER IN SUPPORT OF  
DEFENDANT HILLARY RODHAM CLINTON'S MOTION TO DISMISS  
THE FIRST AMENDED COMPLAINT FOR FAILURE TO STATE A CLAIM**

I, Gloria K. Maier, hereby declare as follows:

1. I am an attorney at the law firm of Williams & Connolly LLP, counsel of record for defendant Hillary Rodham Clinton. I have personal knowledge of the facts set forth in this declaration, and make this declaration in support of Hillary Rodham Clinton's motion to dismiss the first amended complaint for failure to state a claim.

2. Attached hereto as Exhibit 1 is a true and correct copy of an audio recording of the *Campaign HQ With David Plouffe* podcast, dated Oct. 17, 2019.

3. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt from Rep. Gabbard's official campaign website, entitled "Meet Tulsi Gabbard." This screenshot was taken on March 13, 2020.

4. Attached hereto as Exhibit 3 is a true and correct copy of a press release from Rep. Gabbard's official congressional website, dated January 25, 2017, entitled "Congresswoman Tulsi Gabbard Returns from Syria with Renewed Calls: End Regime Change War in Syria Now."

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from Rep. Gabbard's official Twitter account. These screenshots were taken on March 13, 2020.

6. Attached hereto as Exhibit 5 is a true and correct copy of an NBC News online article dated February 2, 2019, entitled "Russia's propaganda machine discovers 2020 Democratic candidate Tulsi Gabbard."

7. Attached hereto as Exhibit 6 is a true and correct copy of an article from The Atlantic, dated September 5, 2019, entitled "The Enduring Mystery of Tulsi Gabbard."

8. Attached hereto as Exhibit 7 is a true and correct copy of an article from The New York Times, dated October 13, 2019, entitled "Left Scratches Its Head and Far Right Swoons at Gabbard Campaign."

9. Attached hereto as Exhibit 8 is a true and correct copy of a transcript of the October 15, 2019 Democratic Debate, as published by the Washington Post on October 16, 2019.

10. Attached hereto as Exhibit 9 is a true and correct copy of a fundraising message from Tulsi Gabbard on the actblue.com fundraising platform, which was linked from an October 20, 2019 Twitter post by Rep. Gabbard. This screenshot was taken on March 13, 2020.

11. Attached hereto as Exhibit 10 is a true and correct copy of a message, dated October 19, 2019, posted by Tulsi Gabbard on her official campaign website, entitled "Hillary Clinton – why don't you join the race?" and seeking donations.

12. Attached hereto as Exhibit 11 is a true and correct copy of a document comparing Plaintiffs' original complaint (ECF No. 1) to Plaintiffs' first amended complaint (ECF No. 23). This document was created using Workshare Compare software. Document headers and the signature block were omitted for ease of comparison, and minor formatting changes were made for ease of readability.

I declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on this 7th day of April 2020,

A handwritten signature in black ink, appearing to read "Gloria K. Maier". The signature is fluid and cursive, with the first name "Gloria" and last name "Maier" clearly distinguishable.

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Gloria K. Maier

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2020, I caused to be filed electronically the foregoing Declaration Of Gloria K. Maier In Support Of Defendant Hillary Rodham Clinton's Motion To Dismiss The First Amended Complaint For Failure To State A Claim with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record in this matter who are on the CM/ECF system.

s/ David E. Kendall  
David E. Kendall